



May 2, 2016

The Honorable Mike Callton
Chairman
Michigan House Health Policy Committee
124 North Capitol Avenue
P.O. Box 30014
Lansing, MI 48909

Dear Chairman Callton:

The American Osteopathic Association (AOA) and the Michigan Osteopathic Association (MOA) are writing to strongly encourage you to oppose HB 4531. This bill would license naturopaths in the state and allow them to use the title of naturopathic physician. The bill also establishes a broad scope of practice for naturopaths to include ordering and performing physical and laboratory tests and ordering diagnostic imaging studies. Further, unlike every other health profession in Michigan, this bill omits many details regarding scope of practice and defers to a national entity to place restrictions on naturopaths in the state. The AOA and MOA believe that health practitioners' scope of practice should be based upon appropriate education, training and competency demonstration requirements. Granting broad practice authority to a new class of practitioners without such requirements places the health and safety of Michigan patients at risk.

The AOA represents more than 123,000 osteopathic physicians (DOs) and osteopathic medical students, promotes public health, encourages scientific research, serves as the primary certifying body for DOs, is the accrediting agency for osteopathic medical schools, and has federal authority to accredit hospitals and other health care facilities. More information on DOs/osteopathic medicine can be found at www.osteopathic.org. MOA is a professional organization that represents over 6,000 DOs providing patient care in Michigan.

The AOA supports the “team” approach to medical care because the physician-led medical model ensures that professionals with complete medical education and training are adequately involved in patient care. We believe that granting authority to a new class of health care provider to deliver services to patients should be directly related to education, training and competency examination. The proposed licensure and practice of naturopaths authorized through this legislation fails to provide the appropriate and necessary education and training standards needed to prescribe prescription drugs to patients, order and perform physical and laboratory tests, and order diagnostic imaging studies.

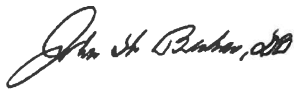
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Naturopathic educational curriculum varies by school. There are six naturopathic schools accredited by the Council on Naturopathic Medical Education (CNME) in the United States. It was only in 2005 that the CNME implemented an approval process for naturopathic residency programs. While opportunities are now available for graduates of naturopathic schools to complete a one or two year residency, this training is still optional. In addition, standard requirements for naturopathy residency curriculum, rotations or experiences do not exist.

The traditional focus of education and training for naturopaths has been holistic and nontoxic approaches to therapy with a strong emphasis on disease prevention and optimizing wellness. Naturopaths do not have the necessary skills, training and education to prescribe prescription drugs safely, or to order and perform a wide variety of physical and laboratory tests and diagnostic imaging studies. Allowing naturopaths to establish a scope of practice that includes these areas without appropriate training, education and competency demonstration requirements may put the health and safety of Michigan patients at risk. This also runs counter to the state's obligation to protect the public. In addition, permitting naturopaths to use the term "physician" in their professional title may be misleading to the public and to patients, implying that they are able to provide the full scope of medical services and have complete medical training. Recognizing naturopaths by their degree, Doctor of Naturopathic Medicine, will help elimination patient confusion about who is providing their care.

To protect the public's health and safety, health professionals' scope of practice must be based on their level of training, education, experience and examination. **We urge you to protect the safety of Michigan's patients by opposing HB 4531.** Should you need any additional information, please feel free to contact Nicholas A. Schilligo, MS, AOA Associate Vice President of State Government Affairs, at nschilligo@osteopathic.org or (800) 621-1773, ext. 8185.

Sincerely,



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President, AOA



Robert Piccinini, DO, FACN
President, MOA

CC: Boyd R. Buser, DO, AOA President-elect
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